



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUN 06 2011

REPLY TO THE ATTENTION OF:

Andrew Stewart
Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707-7921

The U.S. Environmental Protection Agency has the following comments on the Wisconsin Department of Natural Resources' (WDNR) proposed renewal of the Title V operation permit for Manitowoc Public Utilities (MPU), Permit # 436035930-P10.

1. In addition to coal and other fuels, Boilers B06, B07, and B08 are authorized to fire "alternative fuels" which may include municipal solid waste. The boiler is potentially subject to 40 CFR Part 60 Subpart Cb (Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors That are Constructed on or Before September 20, 1994) since the boilers have the capability of firing over 250 tons per day of municipal solid waste. To avoid being subject to 40 CFR Part 60 Subpart Cb, the permit limits the boilers to firing no more than a total of 30% municipal solid waste by weight. The permit conditions should additionally cite the authority of the correct exemption provisions from 40 CFR 60.32b.

Additionally, the provision requires that the facility must officially notify the EPA of their exemption as well as provide a copy of the federally enforceable permit limiting their use of municipal solid waste. Has the facility done this?

2. Compliance Assurance Monitoring (CAM):

Boilers # 6, 7, 8, 9 and processes P31, P32, and P14 are subject to CAM. As part of the permit, the CAM plans are included towards the end. The CAM plans should list the specific indicators for monitoring. As an example, Boiler #6 uses a pressure drop monitor gauge which the facility will monitor to assure that readings are between the ranges of 0.2 inches and 10 inches water column. This range should also be listed in the CAM plan itself, as well as be revised as necessary.

Additionally, the conditions in the permit that require such gauge indicators should include a citation to 40 CFR Part 64. For example, conditions I.C.1.b.(2), I.D.1.b.(3), I.E.1.b.(2), I.F.1.b.(2), I.G.1.b.(2), and I.K.1.b.(3).

Is there monitoring frequency as required by CAM sufficient for all of the emission units subject to CAM in the permit. For example, boilers # 6 and 7 are limited to 25.6 pounds per hour, which is equivalent to 112 tons per year. 40 CFR 64.3(b)(4)(ii) requires all units that are subject to CAM and have a potential to emit greater than 100% of the significance threshold (after controls) to include a monitoring frequency of 4 data points per hour. The permitted is required to maintain a pressure drop monitor gauge and provide readings from the indicator range once per 8 hour shift. Please explain why more frequent monitoring is not needed or revise as necessary.

The remaining comments are enclosed.

Thank you for your consideration. Please have your staff respond as soon as possible so that we may have all concerns worked out prior to the end of the proposed comment period. If you have any questions or concerns regarding these comments, please contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,

A handwritten signature in black ink that reads "Pamela Blakley". The signature is written in a cursive, flowing style.

Pamela Blakley
Chief
Air Permits Section

Enclosure

Additional Comments for Manitowoc Public Utilities permit # 436035930-P20

1. On page 10, the preliminary determination (PD) states both process P28 (Diesel combustion engine) and Boiler B05 will exhaust from stack S10. A Continuous Opacity Monitor (COMs) is required to monitor opacity emissions for process P28, but is not a requirement for Boiler B05. How is it possible that the COMs will be used to demonstrate compliance with only one of the emission units listed above when both emission units exhaust emissions from the same stack? WDNR should consider adding the COMs as the method of demonstrating compliance in the permit for Boiler B05 as well.
2. Boiler B09 and possibly others are subject to New Source Performance Standards (NSPS). The permit does not reference the respective 40 CFR Part 60 applicable NSPS standards. In addition to citing the respective WDNR NSPS rules, the permit should cite to the appropriate federal standard. The appropriate NSPS standard applicable to B09 appears to be 40 CFR Part 60 Subpart Da.
3. Process P28, the Diesel Engine, is subject to 40 CFR 63 Subpart ZZZZ. The correct citation is used in the conditions for this emission unit. However, the heading description incorrectly states that this emission unit is subject to "40 CFR Part 60, Subpart ZZZZ". Please correct it to refer to Part 63 instead of Part 60.
4. According to AP-42, an emission factor up to 280 lb/mmft³ may be used for a boiler (similar to Boiler #5) when firing natural gas. Condition I.A.4.b.(4) requires the facility to use an emission factor of 100 lb/mmft³. Was this emission factor verified through stack testing and/or any other procedure to be appropriate for Boiler #5 firing natural gas?
5. In the recent past, we received from you a copy of comments that were submitted by MPU during the draft public comment period. Apparently, MPU is requesting Boilers #5, 6, and 7 to be removed from the permit, since they have retired them from operation as of November 2010. Will there be another revision to the Title V permit to remove the boilers (and their respective conditions)?